

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

ALL CASES

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) MDL Docket No. 2196
) Index No. 10-MD-2196 (JZ)
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NOTICE OF EXTENSION OF STAY

PLEASE TAKE NOTICE:

1. On February 8, 2012, the Ontario Superior Court of Justice (Commercial List) (the "**Ontario Court**") granted a motion made by Valle Foam Industries (1995) Inc., Domfoam International, Inc., and A-Z Sponge & Foam Products Ltd. (collectively, the "**Debtors**") in connection with their applications under the *Companies' Creditors Arrangement Act*, R.S.C. 1985, c. C-36, as amended (the "**CCAA**"). Among other things, the Order issued by the Ontario Court (attached hereto as Exhibit A) extended the "Stay Period" (as defined in paragraph 13 of that court's original order dated January 12, 2012) from February 10, 2012 to March 30, 2012.

2. On January 27, 2012, the United States Bankruptcy Court for the Northern District of Ohio (the "**Bankruptcy Court**") entered an Order Granting Provisional Relief providing, pursuant to Section 362(a) of the United States Bankruptcy Code, for a stay of each "judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title" (defined as the "**U.S. Litigation Stay**"). Thus, to the extent that the above-captioned actions involve any of

the Debtors, those actions were stayed as to that Debtor by operation of the Order Granting Provisional Relief. The Order Granting Provisional Relief further provided that the stay "shall expire on February 10, 2012 unless the Ontario Court extends the Canadian Stay in which event the U.S. Litigation Stay shall be automatically extended to correspond to the extension of the Canadian Stay."

3. As a result of the Order issued on February 8, 2012 by the Ontario Superior Court of Justice, the U.S. Litigation Stay, as described in the Bankruptcy Court's January 27, 2012 Order Granting Provisional Relief and applicable to the above-captioned cases, has been automatically extended to March 30, 2012.

4. Attached as Exhibit B please find copies of the Initial Order entered by the Ontario Court pursuant to the CCAA on January 12, 2012; the Order Granting Provisional Relief entered by the Bankruptcy Court pursuant to Chapter 15 of the United States Bankruptcy Code on January 27, 2012; and the Suggestion of Bankruptcy and Applicability of Order for Provisional Relief filed in this court on January 27, 2012.

5. The filing of this Notice is not and shall not be construed as a waiver by the Debtors or their estates of any rights, claims, actions, defenses (including, without limitation, any jurisdictional defenses), setoffs or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: February 8, 2012

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2012, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipts. Parties may access this filing through the Court's system.

/s/ Elliot A. Silver
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